

BOARD OF TRUSTEES

DUE DILIGENCE/CONTINUING EDUCATION POLICY

The Board has developed the following guidelines to ensure propriety in actions taken by Board and staff, keeping in mind community values.

OBJECTIVE: The threefold objective of Board and staff is:

- to ensure that business matters pertaining to the Board's investment program are properly attended to
- to ensure Board representation at selected meetings or conferences involving matters of investment-related importance to the Consolidated Retiree Health Benefits Trust (CRHBT), the Board, or the Board program (e.g. annual consultant conferences and annual meetings of membership organizations)
- to ensure that the Board's fiduciary responsibility related to the "prudent person rule" as set forth under state and local law is met by providing adequate educational and networking opportunities to all Board members and staff

REVIEW PROCESS: Due Diligence or Continuing Education requests by a Board staff or member, when acting in his or her official capacity, as a representative of the Board, must be approved by the Board before expenses are incurred. In the case of a request which cannot be approved during a regularly scheduled Board meeting, a majority of the members of the Compliance & Audit Committee must approve the request. The following criteria and procedures will be used to review all requests:

CRITERIA:

- must be solely in the interests of the beneficiaries and participants
- meets Board objectives
- costs are reasonable and within established County regulations
- falls within County ethics guidelines
- reasonable alternatives do not exist for obtaining the benefit of the proposed plan by a less expensive means

REVIEW PROCEDURES:

- ***Annually***, due diligence/continuing education plans and associated costs for the upcoming fiscal year will be reviewed in conjunction with the development of the CRHBT annual budget request.
- ***Quarterly***, the Board will review specific due diligence/continuing education plans (meeting or conference information, estimated costs, and other pertinent information) to ensure compliance with Board policy. The Board will also review reports by members and staff on recent due diligence/continuing education, including conference information materials that may be examined in Board's offices.
- ***Intra-quarter***, due diligence/continuing education plans not previously identified through the quarterly review process will be reviewed by the Compliance & Audit Committee, and must be approved in writing by a majority of the committee, and included in the subsequent quarterly report to the Board.

STAFF REQUIREMENT:

- As defined within the Montgomery County Personnel Regulations, Section 14, Employee Development, funding for employee development obligates the staff member to remain employed with the County for a certain period (depending upon the amount funded) after

completion of any department funded training in whole or in part by trust funds or reimburse the trust fund a pro-rated portion of the monies received.

LOCAL MEETINGS: Local meetings and engagements associated with business or educational opportunities for Board members or staff, which meet the above referenced objectives and criteria, and which do not exceed the County's petty cash reimbursement limit will not be subject to the aforementioned Board review process.

Reference:

Administrative Procedure 1-2, Non-local Travel Guidelines, January 25, 2008

Administrative Procedure 1-5, Local Travel Guidelines, April 13, 2007

Montgomery County Code, Chapter 19A, Ethics

Amended: July 22, 2011

May 16, 2008

January 11, 2008

December 7, 2007

December 2002